REMARKS

In response to the Office Action dated December 31, 2007, the Assignee respectfully requests reconsideration based on the above amendments and on the following remarks.

Claims 1-3, 6-13, 16-19, 21, and 24-24 are pending in this application. Claims 4-5, 14-15, 20, and 22-23 were previously canceled without prejudice or disclaimer.

Telephone Interview

Examiner Vaughn is thanked for the telephone interview of March 17, 2008. The independent claims were discussed, and Scott Zimmerman explained the distinguishing features. No agreement was reached, and Examiner Vaughn will conduct another search.

Rejection of Claims Under § 103 (a)

The Office rejects claims 1-3, 10-13, and 21 under 35 U.S.C. § 103 (a) as being obvious over the YAHOO® search engine ("*Yahoo*") in view of U.S. Patent 6,721,736 to Krug, *et al.* and further in view of U.S. Patent 6,931,660 to Kalluri, *et al.*

Claims 1-3, 10-13, and 21, however, are not obvious over the proposed combination of *Yahoo*, *Krug*, and *Kalluri*. These claims recite, or incorporate, many features that are not disclosed or suggested by *Yahoo*, *Krug*, and *Kalluri*. Independent claim 1, for example, recites "*dividing a display area into regions and mapping the one or more categories associated with the present layer to areas on the display, such that each category maps to a unique, particular region in the display.*" Support for such features may be found at least in the as-filed application at page 11, lines 8-18. Independent claim 1 also recites "*receiving an x-coordinate and a y-coordinate corresponding to a location on the display, the x-coordinate and the y-coordinate defined by a pointing device, the x-coordinate and the y-coordinate representing a first display location.*" Support for such features may be found at least in the as-filed application at page 12,

lines 1-8. Independent claim 1 also recites "*displaying a category that maps to the x-coordinate and the y-coordinate.*" Support for such features may be found at least in the as-filed application at page 12, lines 1-3. Independent claim 1 also recites "*dividing the display area into new regions according to how many digital content items are associated with the category, such that the display area is divided into the new regions, with each content item mapping to particular new region, and mapping the obtained digital content items to the new areas on the display.*" Support for such features may be found at least in the as-filed application at page 15, lines 1-10. Independent claim 1 also recites "*storing a username associated with a user that selects a digital content item and a time of the selection,*" and "*prioritizing the displaying of the one or more digital content items according to the username and the time.*" Support for such features may be found at least in the as-filed application at page 4, lines 1-5. Independent claim 1 is reproduced below, and independent claims 11 and 21 recite similar features.

1.   A method for presenting structured digital content items, comprising:

    a)   reading a first file to obtain one or more categories associated with a present layer, wherein the first file defines a hierarchical structure for presenting digital content items, the hierarchical structure defining a plurality of layers into which digital content items are classified;

    b)   dividing a display area into regions and mapping the one or more categories associated with the present layer to areas on the display, such that each category maps to a unique, particular region in the display;

    c)   receiving an x-coordinate and a y-coordinate corresponding to a location on the display, the x-coordinate and the y-coordinate defined by a pointing device, the x-coordinate and the y-coordinate representing a first display location;

    d)   displaying a category that maps to the x-coordinate and the y-coordinate;

    e)   determining whether the user has selected the first display location;

    f)   if the user has selected the first display location, then determining whether the category mapped to the x-coordinate and the y-coordinate location is associated with a next-lower layer;

    g)   if the category is associated with the next-lower layer, then making the next-lower layer the present layer, and repeating steps a) through g);

h)   if the category is not associated with the next-lower layer, then reading one or more second files associated with the category to obtain one or more sets of one or more digital content items associated with the category, wherein each of the second files associates each of one or more digital content items with the category;

i)   dividing the display area into new regions according to how many digital content items are associated with the category, such that the display area is divided into the new regions, with each content item mapping to particular new region, and mapping the obtained digital content items to the new areas on the display;

j)   displaying the one or more digital content items wherein the displayed items correspond only to a same layer within the hierarchical structure;

k)   receiving a second display location from the user; and

l)   displaying the one or more digital content items corresponding to the second display location;

m)   storing a username associated with a user that selects a digital content item and a time of the selection; and

n)   prioritizing the displaying of the one or more digital content items according to the username and the time.

Yahoo, Krug, and *Kalluri* do not obviate all these features. The Office interprets *Yahoo* as teaching a hierarchical structure in which layers are associated with categories and subcategories. *Krug* discloses a meta search engine that bundles search results from multiple, primary search engines. *See* U.S. Patent 6,721,736 to Krug, *et al.* at column 6, lines 40-55. "The primary search engine returns the search response in the form of an XML document." *See id.* at column 7, lines 5-7. "A hierarchical HTML syntax tree is constructed by a syntax tree parser 20 serving as a basis for all further processing." *Id.* at column 7, lines 45-50. *Kalluri* discloses a decoder that may simultaneously display multiple video streams on a television. U.S. Patent 6,931,660 to Kalluri, *et al.* at column 9, lines 38-45.

Still, though, *Yahoo, Krug,* and *Kalluri* do not obviate independent claims 1, 11, and 21. *Yahoo, Krug,* and *Kalluri,* for example, fail to teach or suggest *"dividing a display area into regions and mapping the one or more categories associated with the present layer to areas on the display, such that each category maps to a unique, particular region in the display."* The proposed combination of *Yahoo, Krug,* and *Kalluri* also fails to teach or suggest *"displaying a*

category that maps to the x-coordinate and the y-coordinate." The proposed combination of *Yahoo*, *Krug*, and *Kalluri* also fails to teach or suggest "*dividing the display area into new regions according to how many digital content items are associated with the category, such that the display area is divided into the new regions, with each content item mapping to particular new region, and mapping the obtained digital content items to the new areas on the display.*" The proposed combination of *Yahoo*, *Krug*, and *Kalluri* also fails to teach or suggest "*storing a username associated with a user that selects a digital content item and a time of the selection,*" and "*prioritizing the displaying of the one or more digital content items according to the username and the time.*" Because the proposed combination of *Yahoo*, *Krug*, and *Kalluri* is silent to at least all these features, one of ordinary skill in the art would not think that independent claims 1, 11, and 21 are obvious.

Claims 1-3, 10-13, and 21, then, are not obvious over the proposed combination of *Yahoo*, *Krug*, and *Kalluri*. Independent claims 1, 11, and 21 recite many features that are not disclosed or suggested by *Yahoo*, *Krug*, and *Kalluri*. The dependent claims incorporate these same features and recite additional features. Claims 1-3, 10-13, and 21, then, cannot be obvious, so the Office is respectfully requested to remove the § 103 (a) rejection of these claims.

Rejection of Claims 6-9, 16-19 & 24-27 under § 103 (a)

The Office also rejected claims 6-9, 16-19, and 24-27 under 35 U.S.C. § 103 (a) as being obvious over *Yahoo*, *Krug*, and *Kalluri* and further in view of U.S. Patent 6,745,161 to Arnold, *et al.*
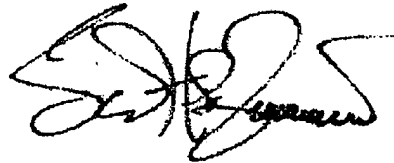
Claims 6-9, 16-19, and 24-27, though, cannot be obvious over *Yahoo*, *Krug*, *Kalluri*, and *Arnold*. These claims depend, respectively, from independent claims 1, 11, and 21 and, thus, incorporate the same distinguishing features. As the above paragraphs explained, *Yahoo*, *Krug*, and *Kalluri* fail to teach or suggest all the features of independent claims 1, 11, and 21, and *Arnold* does not cure these deficiencies. The Office alleges that *Arnold* teaches embedded information in source documents or in tags. Whether or not this allegation is true, the proposed

combination of *Yahoo*, *Krug*, *Kalluri*, and *Arnold* still fails to teach or suggest all the features of independent claims 1, 11, and 21, from which claims 6-9, 16-19, and 24-27 depend. One of ordinary skill in the art, then, would not think that claims 6-9, 16-19, and 24-27 are obvious. The Office is respectfully requested to remove the § 103 (a) rejection of these claims.

If any issues remain outstanding, the Office is requested to contact the undersigned at (919) 469-2629 or *scott@scottzimmerman.com*.

Respectfully submitted,

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